

COMPLIANCE

COMPLAINT HANDLING AND DISPUTE RESOLUTION POLICY

This document is addressed to:

All Authorized Individual or Incorporated Brokers doing business under Optimal Financial Centre Inc.

JANUARY 2011

TABLE OF CONTENTS

Section 1 – Policy Objectives

Section 2 – Person in Charge

Section 3 – Complaint

Section 4 – Receipt of the Complaint

Section 5 – Creation of a Complaint File

Section 6 – Complaint Handling

Section 7 – Transfer to the Regulators

Section 8 – Creation of and Updating Register

Section 9 – Annual Report

Section 10 – Policy Revision

Section 11 – Effective Date

FINANCIAL HORIZONS GROUP COMPLAINT HANDLING AND DISPUTE RESOLUTION POLICY

SECTION 1: POLICY OBJECTIVES

1.1 This policy is in compliance with the provisions set out by the law, the regulators and/or any other regulatory agency and defines the parameters to respect for the free and fair handling of all complaints received by Optimal Financial Centre Inc., hereinafter "Optimal".

1.2 It is intended to govern the receipt of complaints, the delivery of acknowledgement of receipt and notices to the complainant, the creation of the complaint file, and if necessary, the delivery of the complaint file to the concerned regulator, hereinafter the "regulator", of the compilation of complaints for the purpose of preparing and filing a report with the regulator.

1.3 This policy applies only to **WRITTEN** complaints made against Optimal by a complainant, and defines the roles and responsibilities of Optimal's management as concerns its advisors who do business with the firm and are the subject of a client complaint and is in compliance with:

- FHG's code of ethics for its advisors.

SECTION 2 : PERSON IN CHARGE

2.1 Under the CEO's authority, the Compliance Officer is in charge of the application of the policy for all of Optimal's regional offices and services.

2.2 As the person in charge of the application of the policy, the Compliance Officer acts as the representative with the regulatory authorities. He will also train the personnel and provide the personnel with the necessary information in order to comply with this policy.

2.3 In addition to the responsibilities mentioned in article

2.2 The person responsible for the application of this policy has the following duties:

- To send the acknowledgement of receipt of the complaint to the complainant;

- To deliver the required notices to the complainant;
- To send the file to the regulatory authorities, at the complainant's request;
- To keep a complaint register; and
- To file an annual report with the regulatory authorities when required.

2.4 The Compliance Officer may delegate the responsibilities mentioned in articles 2.2 and 2.3 to anyone.

SECTION 3: COMPLAINT

3.1 For the purposes of the policy, a complaint is defined as a written declaration, from a client or any other person acting in the client's name, expressing a reproach regarding the conduct or business of the firm, its employees or any attached advisor. It must include one of the following three elements:

- a) the formulation of a reproach by a complainant or
- b) the identification of potential or real harm to the complainant or
- c) Are quest for remedial action.

3.2 Within the meaning of this policy, the following are not considered to be a complaint:

- Any first level consumer communication or informal step aimed at correcting a particular problem, as long as the problem is handled through regular activities and without the consumer filing a formal complaint;
- Judicial or quasi-judicial procedures and alternative dispute resolution procedures;
- Responses received regarding and pursuant to a survey.

3.3 For a complaint to be receivable, it must be made IN WRITING by the complainant or the person acting on his behalf.

SECTION 4: RECEIPT OF THE COMPLAINT

4.1 The consumer, client or complainant who wishes to file a complaint against Optimal Financial Centre must do so in writing at the following address:

Optimal Financial Centre Inc c/o Compliance Officer:

425 Notre-Dame Street,

Dieppe NB E1A 9G4

4.2 The consumer, client or complainant who wishes to file a complaint against an advisor must do so, in writing, to the advisor's address.

4.3 Any manager who receives a complaint against Optimal, an advisor doing business with a regional office or about the service must forward such complaint to the Compliance Officer immediately.

4.4 The Compliance Officer will forward the complaint, in writing, to the director of the regional office against whom the complaint is intended, within 2 business days of its receipt.

4.5 The director is responsible for sending an acknowledgement of receipt to the client within 5 business days of receipt of the complaint, with a copy to the concerned advisor and to the Compliance Officer stating that the complaint has been received and that the client's allegations are being thoroughly investigated by the firm.

The acknowledgement of receipt of the complaint must include the following information:

- a) A description of the complaint received, specifying the damage suffered;
- b) The name and contact information of the person authorized to handle the complaint;
- c) A request to send, in the case of an incomplete complaint, the relevant information within 30 days, otherwise the complaint will be deemed withdrawn;
- d) A copy of the relevant elements of the Firm's complaint handling policy;
- e) All details required by the firm in order to examine the complaint and for subsequent communications with the complainant;
- f) A notice informing the complainant that after the 90 day period following

the receipt of his complaint has expired, he is entitled to request that his file be transferred to the regulatory authorities if he is not satisfied with the Firm's response or the handling of his complaint;

- g) A notice stating that if necessary, the regulatory authorities can offer mediation services if they deem them necessary and if the parties consent;
- h) A notice reminding the complainant that mediation is an out of court conflict settlement process in which a third party (the mediator) intercedes with the parties to help them reach a satisfactory agreement;
- i) A notice informing the complainant that filing a complaint with the AMF does not interrupt the limitation period for his right to resort to the civil law courts;

SECTION 5: CREATION OF A COMPLAINT FILE

5.1 A separate file must be created for each complaint received.

5.2 The file must include the following elements:

- The complainant's written complaint, including the three elements described in article 3.1;
- The acknowledgement of receipt of the complaint;
- The outcome of the complaint handling process (article 6.1) and
- A copy of Optimal's final response, written and including reasons that was sent to the complainant (article 6.3).

SECTION 6: COMPLAINT HANDLING

6.1 As soon as a complaint is received, the Compliance Officer, or the person he has designated, will begin the investigation.

6.2 The complaint must be handled in a reasonable time frame of 90 days after reception of all documents required for the investigation.

6.3 Once the investigation is completed, the Compliance Officer, or designated person, will send the complainant the final decision in writing and will provide reasons for the decision.

SECTION 7: TRANSFER TO THE REGULATORS

7.1 If applicable, and in the provinces where it is permitted, if the complainant is not satisfied with the final outcome of his complaint or with how the complaint was handled, he may request that Optimal transfer his file to the appropriate regulatory authority.

7.2 The complainant may exercise this right only upon the expiry of the maximum time period set out for a final response: in Quebec, one year from the receipt of such response, in the other provinces, the period set out by common law and the regulatory authorities.

7.3 The transferred file includes all of the documents regarding the complaint (5.2).

7.4 The Compliance Officer is responsible for the enforcement of the Protection of personal information rules.

SECTION 8: CREATION OF AND UPDATING A REGISTER

8.1 For the purposes of this policy, one complaint register is established for all of Optimal's regional offices and services.

8.2 The Compliance Officer and/or the person he delegates to this end will be in charge of establishing the complaint register and keeping it up to date.

8.3 Any complaint recorded in the register must respect the definition of the word "complaint" as defined in article 3.

SECTION 9: ANNUAL REPORT

9.1 Sixty (60) days after the end of the fiscal year, the Compliance Officer and/or the person he delegates to this end shall file a report with the regulatory authorities indicating the number and nature of complaints received according to categories set forth in the register established by Optimal.

SECTION 10: POLICY REVISION

10.1 The Compliance Officer is responsible for revising the present policy and must indicate the date of the amendment and of its approval by the board of directors.

SECTION 11: EFFECTIVE DATE

11.1 This policy will become effective as soon as the board of directors approves it.